

1
2
3
4
5
6
7
8 **BEFORE THE**
9 **BOARD OF BEHAVIORAL SCIENCES**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Petition to Revoke
13 Probation Against:

14 **ISAAC CARREON**
15 4193 Flat Rock Drive, Ste. 200
16 Riverside, CA 92505-7113

17 **Licensed Marriage and Family Therapist**
18 **License No. LMFT 48464**

19 Respondent.

Case No. 2002022002715

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

20 **FINDINGS OF FACT**

21 1. On or about July 12, 2022, Complainant Steve Sodergren, in his official capacity as
22 the Executive Officer of the Board of Behavioral Sciences, Department of Consumer Affairs,
23 filed Petition to Revoke Probation No. 2002022002715 against Isaac Carreon (Respondent)
24 before the Board of Behavioral Sciences. (Petition to Revoke Probation attached as Exhibit A.)

25 2. On or about April 30, 2010, the Board of Behavioral Sciences (Board) issued
26 Licensed Marriage and Family Therapist License No. LMFT 48464 to Respondent. The Licensed
27 Marriage and Family Therapist License was in full force and effect at all times relevant to the
28 charges brought in Petition to Revoke Probation No. 2002022002715 and will expire on June 30,
2023, unless renewed.

1 3. On or about July 18, 2022, Respondent was served by Certified and First Class Mail
2 copies of the Petition to Revoke Probation No. 2002022002715, Statement to Respondent, Notice
3 of Defense, Request for Discovery, and Discovery Statutes (Government Code sections 11507.5,
4 11507.6, and 11507.7) at Respondent's address of record which, pursuant to Business and
5 Professions Code section 136, is required to be reported and maintained with the Board.
6 Respondent's address of record was and is: 4193 Flat Rock Drive, Ste. 200, Riverside, CA 92505-
7 7113.

8 4. Service of the Petition to Revoke Probation was effective as a matter of law under the
9 provisions of Government Code section 11505(c) and/or Business and Professions Code section
10 124.

11 5. Government Code section 11506(c) states, in pertinent part:

12 (c) The respondent shall be entitled to a hearing on the merits if the respondent
13 files a notice of defense . . . and the notice shall be deemed a specific denial of all
14 parts of the accusation . . . not expressly admitted. Failure to file a notice of defense
15 . . . shall constitute a waiver of respondent's right to a hearing, but the agency in its
16 discretion may nevertheless grant a hearing.

17 6. The Board takes official notice of its records and the fact that Respondent failed to
18 file a Notice of Defense within 15 days after service upon him of the Petition to Revoke
19 Probation, and therefore waived his right to a hearing on the merits of Petition to Revoke
20 Probation No. 2002022002715.

21 7. California Government Code section 11520(a) states, in pertinent part:

22 (a) If the respondent either fails to file a notice of defense . . . or to appear at
23 the hearing, the agency may take action based upon the respondent's express
24 admissions or upon other evidence and affidavits may be used as evidence without
25 any notice to respondent

26 8. Pursuant to its authority under Government Code section 11520, the Board finds
27 Respondent is in default. The Board will take action without further hearing and, based on the
28 relevant evidence contained in the Default Decision Investigatory Evidence Packet in this matter,
finds that the charges and allegations in Petition to Revoke Probation No. 2002022002715, are
separately and severally, found to be true and correct by clear and convincing evidence.

///

1 **DETERMINATION OF ISSUES**

2 1. Based on the foregoing findings of fact, Respondent Isaac Carreon has subjected his
3 Licensed Marriage and Family Therapist License No. LMFT 48464 to discipline.

4 2. The agency has jurisdiction to adjudicate this case by default.

5 3. The Board of Behavioral Sciences is authorized to revoke Respondent's Licensed
6 Marriage and Family Therapist License based upon the following violations alleged in the
7 Petition to Revoke Probation which are supported by the evidence contained in the Default
8 Decision Investigatory Evidence Packet in this case:

9 a. Condition 6 (Failure to Obey All Laws); and

10 b. Condition 8 (Failure to Comply with Probation Program).

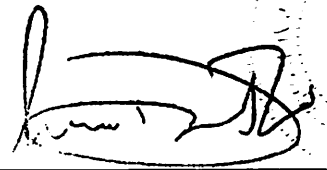
11 **ORDER**

12 IT IS SO ORDERED that Licensed Marriage and Family Therapist License No. LMFT
13 48464, issued to Respondent Isaac Carreon, is revoked.

14 Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a
15 written motion requesting that the Decision be vacated and stating the grounds relied on within
16 seven (7) days after service of the Decision on Respondent. The agency in its discretion may
17 vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

18 This Decision shall become effective on January 5, 2023.

19 It is so ORDERED December 6, 2022



20
21 **FOR THE BOARD OF BEHAVIORAL SCIENCES**
22 **DEPARTMENT OF CONSUMER AFFAIRS**

23
24 DEFAULT DECISION AND ORDER LA2022602477.DOCX
DOJ Matter ID:LA2022601936

25 Attachment:
26 Exhibit A: Petition to Revoke Probation

Exhibit A

Petition to Revoke Probation

(ISAAC CARREON)

1 ROB BONTA
Attorney General of California
2 THOMAS L. RINALDI
Supervising Deputy Attorney General
3 ARMANDO ZAMBRANO
Supervising Deputy Attorney General
4 State Bar No. 225325
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 269-6322
6 Facsimile: (916) 731-2126
E-mail: Armando.Zambrano@doj.ca.gov
7 *Attorneys for Complainant*

8
9 **BEFORE THE**
BOARD OF BEHAVIORAL SCIENCES
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Petition to Revoke
Probation Against:

Case No. 2002022002715

13 **ISAAC CARREON**
14 4193 Flat Rock Drive, Ste. 200
Riverside, CA 92505-7113

PETITION TO REVOKE PROBATION

15 **Licensed Marriage and Family Therapist**
16 **License No. LMFT 48464**

17 Respondent.

18
19 **PARTIES**

20 1. Steve Sodergren (Complainant) brings this Petition to Revoke Probation solely in his
21 official capacity as the Executive Officer of the Board of Behavioral Sciences (Board),
22 Department of Consumer Affairs.

23 2. On or about April 30, 2010, the Board issued Licensed Marriage and Family
24 Therapist License Number LMFT 48464 to Isaac Carreon (Respondent). The Licensed Marriage
25 and Family Therapist License was in effect at all times relevant to the charges brought herein and
26 will expire on June 30, 2023, unless renewed.

27 ///

28 ///

3. In a disciplinary action titled *In the Matter of Accusation Against Isaac Carreon*, Case No. 2002017001275, the Board issued a decision and order, effective January 10, 2019, in which Respondent's Licensed Marriage and Family Therapist License was revoked. However, the revocation was stayed and Respondent's Licensed Marriage and Family Therapist License was placed on probation for a period of six (6) years with certain terms and conditions. A copy of that decision is attached as Exhibit A and is incorporated by reference.

JURISDICTION

4. This Petition to Revoke Probation is brought before the Board under the authority of the decision and order *In the Matter of Accusation Against Isaac Carreon*, Case No. 2002017001275. Probation Term and Condition 15 states:

Violation of Probation

If respondent violates the conditions of his probation, the Board, after giving respondent notice and the opportunity to be heard, may set aside the stay order and impose the discipline (revocation/suspension) of respondent's license provided in the decision.

If during the period of probation, an accusation, petition to revoke probation, or statement of issues has been filed against respondent's license or application for licensure, or the Attorney General's office has been requested to prepare such an accusation, petition to revoke probation, or statement of issues, the probation period set forth in this decision shall be automatically extended and shall not expire until the accusation, petition to revoke probation, or statement of issues has been acted upon by the board. Upon successful completion of probation, respondent's license shall be fully restored.

5. On or about May 24, 2022, the Board requested the Office of the Attorney General to prepare a Petition to Revoke Probation against Respondent's license, thereby automatically extending the probationary period, which shall not expire until the Petition has been acted upon by the Board.

FIRST CAUSE TO REVOKE PROBATION

(Failure to Obey All Laws)

6. At all times after the effective date of Respondent's probation, Condition 6 stated:

Obey All Laws

Respondent shall obey all federal, state and local laws, all statutes and regulations governing the licensee, and remain in full compliance with any court ordered criminal probation, payments and other orders. A full and detailed account of

1 any and all violations of law shall be reported by the respondent to the Board or its
2 designee in writing within seventy-two (72) hours of occurrence. To permit
3 monitoring of compliance with this term, respondent shall submit fingerprints through
4 the Department of Justice and Federal Bureau of Investigation within 30 days of the
effective date of the decision, unless previously submitted as part of the licensure
application process. Respondent shall pay the cost associated with the fingerprint
process.

5 7. Respondent's probation is subject to revocation because he failed to comply with
6 Probation Condition 6, referenced above. The facts and circumstances regarding this violation
7 are that on or about August 27, 2020, in a disciplinary action titled *In the Matter of Accusation*
8 *Against Isaac Carreon*, Case No. 600-2019-000056, the Board of Psychology filed an Accusation
9 against Respondent's Registered Psychological Assistant No. PSD 94021734. The causes for
10 discipline included engaging in sexual misconduct with a patient; impersonation of another
11 licensee – Board of Psychology forms; impersonation of another licensee – U.S. Department of
12 Homeland Security, Citizenship and Immigrations Services filings; perjury – Board of
13 Psychology filings; perjury – U.S. Department of Homeland Security, Citizenship and
14 Immigrations Services filings; attempting to prevent patient from filing a complaint; willful
15 failure to disclose BBS discipline; willful failure to fully disclose criminal conviction; making
16 false, fraudulent, and/or deceptive statements in acquiring and/or renewing psychological
17 assistant registration number; fraudulently misrepresenting license status; unlicensed practice of
18 psychology; commission of multiple dishonest, corrupt, and/or fraudulent acts; use of alcohol in a
19 dangerous manner; imposition of discipline by a licensing board; and sustaining a criminal
20 conviction substantially related to the qualifications, functions or duties of a psychological
21 assistant. On or about August 13, 2021, Respondent voluntarily signed a Stipulated Settlement
22 and Disciplinary Order. Effective January 22, 2022, Respondent's Registered Psychological
23 Assistant No. PSD 94021734 was revoked.

24 ///

25 ///

26 ///

27 ///

28 ///

Exhibit A

Decision and Order

Board of Behavioral Sciences Case No. 2002017001275

**BEFORE THE
BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**ISAAC CARREON
4193 Flat Rock Drive, Ste. 200
Riverside, CA 92505-7113**

**Licensed Marriage and Family Therapist
License No. LMFT 48464**

Respondent.

Case No. 2002017001275

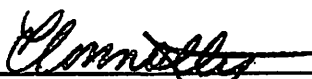
OAH No. 2018060648

DECISION & ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Behavioral Sciences, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on January 10, 2019.

It is so ORDERED December 11, 2018.



FOR THE BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS

1 XAVIER BECERRA
Attorney General of California
2 ANTOINETTE B. CINCOTTA
Supervising Deputy Attorney General
3 ALAN MACINA
Deputy Attorney General
4 State Bar No. 233540
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9083
7 Facsimile: (619) 645-2061
E-mail: Alan.Macina@doj.ca.gov
8 *Attorneys for Complainant*

9
10 **BEFORE THE**
BOARD OF BEHAVIORAL SCIENCES
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. 2002017001275

14 **ISAAC CARREON**
4193 Flat Rock Drive, Ste. 200
15 Riverside, CA 92505-7113

OAH No. 2018060648

16 **Licensed Marriage and Family Therapist**
License No. LMFT 48464

**STIPULATED SETTLEMENT &
DISCIPLINARY ORDER**

17 Respondent.
18

19 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties to the above-
20 entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. Kim Madsen (Complainant) is the Executive Officer of the Board of Behavioral
23 Sciences (Board). She brought this action solely in her official capacity and is represented in this
24 matter by Xavier Becerra, Attorney General of the State of California, by Alan Macina, Deputy
25 Attorney General.

26 2. Respondent Isaac Carreon (Respondent) is represented in this proceeding by attorney
27 Brandt Caudill, Jr., Esq., whose address is: 2601 Main Street, Suite 800, Irvine, California
28 92614.

3. On or about April 30, 2010, the Board issued Licensed Marriage and Family Therapist License No. LMFT 48464 to Respondent. The Licensed Marriage and Family Therapist License was in full force and effect at all times relevant to the charges brought in Accusation No. 2002017001275, and will expire on June 30, 2019, unless renewed.

JURISDICTION

4. Accusation No. 2002017001275 was filed before the Board and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on January 19, 2018. Respondent timely filed his Notice of Defense contesting the Accusation. The Second Amended Accusation and all other statutorily required documents were properly served on Respondent on June 29, 2018.

5. A copy of Accusation No. 2002017001275 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and fully understands the charges and allegations in Accusation No. 2002017001275. Respondent has also carefully read, fully discussed with counsel, and fully understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

9. Respondent understands and agrees that the charges and allegations in Accusation No. 2002017001275, if proven at a hearing, constitute cause for imposing discipline upon his

1 Licensed Marriage and Family Therapist License.

2 10. For the purpose of resolving the Accusation without the expense and uncertainty of
3 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
4 basis for the causes for discipline, and that Respondent hereby gives up his right to contest those
5 charges.

6 11. Respondent agrees that his Licensed Marriage and Family Therapist License is
7 subject to discipline and he agrees to be bound by the Board's probationary terms as set forth in
8 the Disciplinary Order below.

9 CONTINGENCY

10 12. This stipulation shall be subject to approval by the Board of Behavioral Sciences.
11 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
12 Behavioral Sciences may communicate directly with the Board regarding this stipulation and
13 settlement, without notice to or participation by Respondent or his counsel. By signing the
14 stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek
15 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
16 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
17 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
18 action between the parties, and the Board shall not be disqualified from further action by having
19 considered this matter.

20 13. The parties understand and agree that Portable Document Format (PDF) and facsimile
21 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
22 signatures thereto, shall have the same force and effect as the originals.

23 14. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
24 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
25 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
26 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
27 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
28 writing executed by an authorized representative of each of the parties.

1 this decision, respondent shall submit to the Board or its designee for its prior approval the name
2 and qualifications of one or more therapists of respondent's choice. Such therapist shall possess a
3 valid California license to practice and shall have had no prior business, professional, or personal
4 relationship with respondent, and shall not be the respondent's supervisor. Counseling shall be at
5 least once a week unless otherwise determined by the Board. Respondent shall continue in such
6 therapy at the Board's discretion. Cost of such therapy is to be borne by respondent.

7 Respondent may, after receiving the Board's written permission, receive therapy via
8 videoconferencing if respondent's good faith attempts to secure face-to-face counseling are
9 unsuccessful due to the unavailability of qualified mental health care professionals in the area.

10 The Board may require that respondent provide written documentation of his good-faith attempts
11 to secure counseling via videoconferencing.

12 Respondent shall provide the therapist with a copy of the Board's decision no later than the
13 first counseling session. Upon approval by the Board, respondent shall undergo and continue
14 treatment until the Board or its designee determines that no further psychotherapy is necessary.

15 Respondent shall take all necessary steps to ensure that the treating psychotherapist submits
16 quarterly written reports to the Board concerning respondent's fitness to practice, progress in
17 treatment, and to provide such other information as may be required by the Board. Respondent
18 shall execute a Release of Information authorizing the therapist to divulge information to the
19 Board.

20 If the treating psychotherapist finds that respondent cannot practice safely or independently,
21 the psychotherapist shall notify the Board within three (3) working days. Upon notification by
22 the Board, respondent shall immediately cease practice and shall not resume practice until
23 notified by the Board or its designee that respondent may do so. Respondent shall not thereafter
24 engage in any practice for which a license issued by the Board is required until the Board or its
25 designee has notified respondent that he may resume practice. Respondent shall document
26 compliance with this condition in the manner required by the Board.

27 3. Supervised Practice

28 Within 30 days of the effective date of this decision, respondent shall submit to the Board

1 or its designee, for its prior approval, the name and qualification of one or more proposed
2 supervisors and a plan by each supervisor. The supervisor shall be a current California licensed
3 practitioner in respondent's field of practice, who shall submit written reports to the Board or its
4 designee on a quarterly basis verifying that supervision has taken place as required and including
5 an evaluation of respondent's performance. The supervisor shall be independent, with no prior
6 business, professional or personal relationship with respondent.

7 If respondent is unable to secure a supervisor in his field of practice due to the
8 unavailability of mental health care professionals in the area, then the Board may consider the
9 following options for satisfying this probationary term:

- 10 (1) Permitting the respondent to receive supervision via videoconferencing; or,
- 11 (2) Permitting respondent to secure a supervisor not in the respondent's field of practice.

12 The forgoing options shall be considered and exhausted by the Board in the order listed
13 above. The Board may require that respondent provide written documentation of his good-faith
14 attempts to secure face-to-face supervision, supervision via videoconferencing or to locate a
15 mental health professional that is licensed in the respondent's field of practice.

16 Respondent shall complete any required consent forms and sign an agreement with the
17 supervisor and the Board regarding the Respondent and the supervisor's requirements and
18 reporting responsibilities. Failure to file the required reports in a timely fashion shall be a
19 violation of probation. Respondent shall give the supervisor access to respondent's fiscal and
20 client records. Supervision obtained from a probation supervisor shall not be used as experience
21 gained toward licensure.

22 If the supervisor is no longer available, respondent shall notify the Board within 15 days
23 and shall not practice until a new supervisor has been approved by the Board. All costs of the
24 supervision shall be borne by respondent. Supervision shall consist of at least one (1) hour per
25 week in individual face to face meetings. The supervisor shall not be the respondent's therapist.
26 Respondent shall not practice until he has received notification that the Board has approved
27 respondent's supervisor.

28 ///

1 **4. Education: Dual Relationships/Boundaries Course**

2 Respondent shall take and successfully complete the equivalency of two semester units in
3 Dual Relationships/Boundaries. All course work shall be taken at the graduate level at an
4 accredited or approved educational institution that offers a qualifying degree for licensure as a
5 marriage and family therapist, clinical social worker, educational psychologist, or professional
6 clinical counselor or through a course approved by the Board. Classroom attendance must be
7 specifically required. Course content shall be pertinent to the violation and all course work must
8 be completed within one year from the effective date of this Decision.

9 Within 90 days of the effective date of this Decision, respondent shall submit a plan for
10 prior Board approval for meeting these educational requirements. All costs of the course work
11 shall be paid by the respondent. Units obtained for an approved course shall not be used for
12 continuing education units required for renewal of licensure.

13 **5. Education: Law & Ethics Course**

14 Respondent shall take and successfully complete the equivalency of two semester units in
15 law and ethics. Course work shall be taken at the graduate level at an accredited or approved
16 educational institution that offers a qualifying degree for licensure as a marriage and family
17 therapist, clinical social worker, educational psychologist, professional clinical counselor as
18 defined in sections 4980.40, 4996.18, 4999.32 or 4999.33 of the Business and Professions Codes
19 and section 1854 of Title 16 of the California Code of Regulations or through a course approved
20 by the Board. Classroom attendance must be specifically required.

21 Within 90 days of the effective date of this Decision, respondent shall submit a plan for
22 prior Board approval for meeting this educational requirement. Said course must be taken and
23 completed within one year from the effective date of this Decision. The costs associated with the
24 law and ethics course shall be paid by the respondent. Units obtained for an approved course in
25 law and ethics shall not be used for continuing education units required for renewal of licensure.

26 **6. Obey All Laws**

27 Respondent shall obey all federal, state and local laws, all statutes and regulations
28 governing the licensee, and remain in full compliance with any court ordered criminal probation,

1 payments and other orders. A full and detailed account of any and all violations of law shall be
2 reported by the respondent to the Board or its designee in writing within seventy-two (72) hours
3 of occurrence. To permit monitoring of compliance with this term, respondent shall submit
4 fingerprints through the Department of Justice and Federal Bureau of Investigation within 30 days
5 of the effective date of the decision, unless previously submitted as part of the licensure
6 application process. Respondent shall pay the cost associated with the fingerprint process.

7 **7. File Quarterly Reports**

8 Respondent shall submit quarterly reports, to the Board or its designee, as scheduled on the
9 "Quarterly Report Form" (rev. 01/12/01). Respondent shall state under penalty of perjury
10 whether he has been in compliance with all the conditions of probation. Notwithstanding any
11 provision for tolling of requirements of probation, during the cessation of practice respondent
12 shall continue to submit quarterly reports under penalty of perjury.

13 **8. Comply with Probation Program**

14 Respondent shall comply with the probation program established by the Board and
15 cooperate with representatives of the Board in its monitoring and investigation of the
16 respondent's compliance with the program.

17 **9. Interviews with the Board**

18 Respondent shall appear in person for interviews with the Board or its designee upon
19 request at various intervals and with reasonable notice.

20 **10. Failure to Practice**

21 In the event respondent stops practicing in California, respondent shall notify the Board or
22 its designee in writing within 30 calendar days prior to the dates of non-practice and return to
23 practice. Non-practice is defined as any period of time exceeding thirty calendar days in which
24 respondent is not engaging in any activities defined in Sections 4980.02, 4989.14, 4996.9, or
25 4999.20 of the Business and Professions Code. Any period of non-practice, as defined in this
26 condition, will not apply to the reduction of the probationary term and will relieve respondent of
27 the responsibility to comply with the probationary terms and conditions with the exception of this
28 condition and the following terms and conditions of probation: Obey All Laws; File Quarterly

1 Reports; Comply with Probation Program; Maintain Valid License/Registration; and Cost
2 Recovery. The failure to practice for a total of two years shall be a violation of probation and
3 respondent's license shall be subject to cancellation.

4 **11. Change of Place of Employment or Place of Residence**

5 Respondent shall notify the Board or its designee in writing within 30 days of any change
6 of place of employment or place of residence. The written notice shall include the address, the
7 telephone number and the date of the change.

8 **12. Supervision of Unlicensed Persons**

9 While on probation, respondent shall not act as a supervisor for any hours of supervised
10 practice required for any license issued by the Board. Respondent shall terminate any such
11 supervisory relationship in existence on the effective date of this Decision.

12 **13. Notification to Clients**

13 Respondent shall notify all clients when any term or condition of probation will affect their
14 therapy or the confidentiality of their records, including but not limited to supervised practice,
15 suspension, or client population restriction. Such notification shall be signed by each client prior
16 to continuing or commencing treatment. Respondent shall submit, upon request by the Board or
17 its designee, satisfactory evidence of compliance with this term of probation.

18 **14. Notification to Employer**

19 Respondent shall provide each of his current or future employers, when performing services
20 that fall within the scope of practice of his license, a copy of this Decision and the Statement of
21 Issues or Accusation before commencing employment. Notification to the respondent's current
22 employer shall occur no later than the effective date of the Decision or immediately upon
23 commencing employment. Respondent shall submit, upon request by the Board or its designee,
24 satisfactory evidence of compliance with this term of probation.

25 The Respondent shall provide to the Board the names, physical addresses, and telephone
26 numbers of all employers, supervisors, and contractors.

27 Respondent shall complete the required consent forms and sign an agreement with the
28 employer and supervisor, or contractor, and the Board to allow the Board to communicate with

1 the employer and supervisor or contractor regarding the licensee or registrant's work status,
2 performance, and monitoring.

3 **15. Violation of Probation**

4 If respondent violates the conditions of his probation, the Board, after giving respondent
5 notice and the opportunity to be heard, may set aside the stay order and impose the discipline
6 (revocation/suspension) of respondent's license provided in the decision.

7 If during the period of probation, an accusation, petition to revoke probation, or statement
8 of issues has been filed against respondent's license or application for licensure, or the Attorney
9 General's office has been requested to prepare such an accusation, petition to revoke probation, or
10 statement of issues, the probation period set forth in this decision shall be automatically extended
11 and shall not expire until the accusation, petition to revoke probation, or statement of issues has
12 been acted upon by the board. Upon successful completion of probation, respondent's license
13 shall be fully restored.

14 **16. Maintain Valid License**

15 Respondent shall, at all times while on probation, maintain a current and active license with
16 the Board, including any period during which suspension or probation is tolled. Should
17 respondent's license, by operation of law or otherwise, expire, upon renewal respondent's license
18 shall be subject to any and all terms of this probation not previously satisfied.

19 **17. License Surrender**

20 Following the effective date of this decision, if respondent ceases practicing due to
21 retirement or health reasons, or is otherwise unable to satisfy the terms and conditions of
22 probation, respondent may voluntarily request the surrender of his license to the Board. The
23 Board reserves the right to evaluate the respondent's request and to exercise its discretion whether
24 to grant the request or to take any other action deemed appropriate and reasonable under the
25 circumstances. Upon formal acceptance of the surrender, respondent shall within 30 calendar
26 days deliver respondent's license and certificate and if applicable wall certificate to the Board or
27 its designee and respondent shall no longer engage in any practice for which a license is required.
28 Upon formal acceptance of the tendered license, respondent will no longer be subject to the terms

1 and conditions of probation.

2 Voluntary surrender of respondent's license shall be considered to be a disciplinary action
3 and shall become a part of respondent's license history with the Board. Respondent may not
4 petition the Board for reinstatement of the surrendered license. Should respondent at any time
5 after voluntary surrender ever reapply to the Board for licensure respondent must meet all current
6 requirements for licensure including, but not limited to, filing a current application, meeting all
7 current educational and experience requirements, and taking and passing any and all examinations
8 required of new applicants.

9 **18. Instruction of Coursework Qualifying for Continuing Education**

10 Respondent shall not be an instructor of any coursework for continuing education credit
11 required by any license issued by the Board.

12 **19. Notification to Referral Services**

13 Respondent shall immediately send a copy of this decision to all referral services registered
14 with the Board in which respondent is a participant. While on probation, respondent shall send a
15 copy of this decision to all referral services registered with the Board that respondent seeks to
16 join.

17 **20. Reimbursement of Probation Program**

18 Respondent shall reimburse the Board for the costs it incurs in monitoring the probation to
19 ensure compliance for the duration of the probation period. Reimbursement costs shall be
20 \$1,200.00 per year.

21 **21. Cost Recovery**

22 Respondent shall pay the Board \$13,448.75 for the reasonable costs of the investigation and
23 prosecution of Case No. 2002017001275. The Board will permit Respondent to make payments
24 on a schedule to be determined. Respondent shall make the check or money order payable to the
25 Board of Behavioral Sciences and shall indicate on the check or money order that it is the cost
26 recovery payment for Case No. 2002017001275. Any order for payment of cost recovery shall
27 remain in effect whether or not probation is tolled. Probation shall not terminate until full
28 payment has been made. Should any part of cost recovery not be paid in accordance with the

1 outlined payment schedule, respondent shall be considered to be in violation of probation. A
2 period of non-practice by respondent shall not relieve respondent of his obligation to reimburse
3 the board for its costs.

4 Cost recovery must be completed six months prior to the termination of probation. A
5 payment plan authorized by the Board may be extended at the discretion of the Enforcement
6 Manager based on good cause shown by the probationer.

7 ACCEPTANCE

8 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
9 discussed it with my attorney, Brandt Caudill, Jr., Esq. I understand the stipulation and the effect
10 it will have on my Licensed Marriage and Family Therapist License. I enter into this Stipulated
11 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
12 bound by the Decision and Order of the Board of Behavioral Sciences.

13
14 DATED: 9/24/18


ISAAC CARREON
Respondent

16 I have read and fully discussed with Respondent Isaac Carreon the terms and conditions and
17 other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its
18 form and content.

19 DATED: 9/24/18


BRANDT CAUDILL, JR., ESQ.
Attorney for Respondent

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Behavioral Sciences.

Dated: Sept. 24, 2018.

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
ANTOINETTE B. CINCOTTA
Supervising Deputy Attorney General


ALAN MACINA
Deputy Attorney General
Attorneys for Complainant

SD2017802291
71605106.docx

Exhibit A

Accusation No. 2002017001275

1 **XAVIER BECERRA**
Attorney General of California
2 **ANTOINETTE B. CINCOTTA**
Supervising Deputy Attorney General
3 **ALAN MACINA**
Deputy Attorney General
4 State Bar No. 233540
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9083
7 Facsimile: (619) 645-2061
Attorneys for Complainant

9
10 **BEFORE THE**
BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2002017001275

13 **ISAAC CARREON**
4193 Flat Rock Drive, Ste. 200
14 Riverside, CA 92505-7113

SECOND AMENDED ACCUSATION

15 Licensed Marriage and Family Therapist
16 License Number LMFT 48464

17 Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Kim Madsen (Complainant) brings this First Amended Accusation solely in her
21 official capacity as the Executive Officer of the Board of Behavioral Sciences (Board),
22 Department of Consumer Affairs.

23 2. On or about April 30, 2010, the Board issued Licensed Marriage and Family
24 Therapist License Number LMFT 48464 to Isaac Carreon (Respondent). The Licensed Marriage
25 and Family Therapist License was in full force and effect at all times relevant to the charges and
26 allegations brought herein and will expire on June 30, 2019, unless renewed.

27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JURISDICTION

3. This First Amended Accusation is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 118, subdivision (b) of the Code provides that the suspension, expiration, surrender, or cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within the license may be renewed, restored, reissued, or reinstated.

STATUTORY PROVISIONS

5. Section 726, subdivision (a), of the Code states:

(a) The commission of any act of sexual abuse, misconduct, or relations with a patient, client, or customer constitutes unprofessional conduct and grounds for disciplinary action for any person licensed under this division or under any initiative act referred to in this division.

6. Section 729 of the Code states:

(a) Any physician and surgeon, psychotherapist, alcohol and drug abuse counselor or any person holding himself or herself out to be a physician and surgeon, psychotherapist, or alcohol and drug abuse counselor, who engages in an act of sexual intercourse, sodomy, oral copulation, or sexual contact with a patient or client, or with a former patient or client when the relationship was terminated primarily for the purpose of engaging in those acts, unless the physician and surgeon, psychotherapist, or alcohol and drug abuse counselor has referred the patient or client to an independent and objective physician and surgeon, psychotherapist, or alcohol and drug abuse counselor recommended by a third-party physician and surgeon, psychotherapist, or alcohol and drug abuse counselor for treatment, is guilty of sexual exploitation by a physician and surgeon, psychotherapist, or alcohol and drug abuse counselor.

(b) Sexual exploitation by a physician and surgeon, psychotherapist, or alcohol and drug abuse counselor is a public offense:

(1) An act in violation of subdivision (a) shall be punishable by imprisonment in a county jail for a period of not more than six months, or a fine not exceeding one thousand dollars (\$1,000), or by both that imprisonment and fine.

(2) Multiple acts in violation of subdivision (a) with a single victim, when the offender has no prior conviction for sexual exploitation, shall be punishable by imprisonment in a county jail for a period of not more than six months, or a fine not exceeding one thousand dollars (\$1,000), or by both that imprisonment and fine.

...

For purposes of subdivision (a), in no instance shall consent of the patient or client be a defense

1 (c) For purposes of this section:

2 (1) "Psychotherapist" has the same meaning as defined in Section 728.

3 ...

4 (3) "Sexual contact" means sexual intercourse or the touching of an intimate
part of a patient for the purpose of sexual arousal, gratification, or abuse.

5 (4) "Intimate part" and "touching" have the same meanings as defined in
Section 243.4 of the Penal Code.

6

7 7. Section 4982 states:

8 The board may deny a license or registration or may suspend or revoke the
9 license or registration of a licensee or registrant if he or she has been guilty of
unprofessional conduct. Unprofessional conduct includes, but is not limited to, the
10 following:

11 (a) The conviction of a crime substantially related to the qualifications,
functions, or duties of a licensee [A] conviction following a plea of nolo
12 contendere made to a charge substantially related to the qualifications, functions, or
duties of a licensee or registrant under this chapter shall be deemed to be a
13 conviction within the meaning of this section

14 ...

15 (c) Administering to himself or herself any controlled substance or using of
any of the dangerous drugs specified in Section 4022, or of any alcoholic beverage
16 to the extent, or in a manner, as to be dangerous or injurious to the person applying
for a registration or license or holding a registration or license under this chapter, or
17 to any other person, or to the public, or, to the extent that the use impairs the ability
of the person applying for or holding a registration or license to conduct with safety
to the public the practice authorized by the registration or license. The board shall
18 deny an application for a registration or license or revoke the license or registration
of any person, other than one who is licensed as a physician and surgeon, who uses
19 or offers to use drugs in the course of performing marriage and family therapy
services.

20 (d) Gross negligence or incompetence in the performance of marriage and
family therapy.

21 (e) Violating, attempting to violate, or conspiring to violate any of the
provisions of this chapter or any regulation adopted by the board.

22 ...

23 (i) Intentionally or recklessly causing physical or emotional harm to any
24 client.

25 (j) The commission of any dishonest, corrupt, or fraudulent act substantially
related to the qualifications, functions, or duties of a licensee or registrant.

26 (k) Engaging in sexual relations with a client, or a former client within two
years following termination of therapy, soliciting sexual relations with a client, or
27 committing an act of sexual abuse, or sexual misconduct with a client, or
committing an act punishable as a sexually related crime, if that act or solicitation is
28 substantially related to the qualifications, functions, or duties of a marriage and
family therapist.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

....

8. Section 4982.26 of the Code states:

The board shall revoke any license issued under this chapter upon a decision made in accordance with the procedures set forth in Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, that contains any finding of fact that the licensee or registrant engaged in any act of sexual contact, as defined in Section 729, when that act is with a patient, or with a former patient when the relationship was terminated primarily for the purpose of engaging in that act. The revocation shall not be stayed by the administrative law judge or the board.

REGULATORY PROVISIONS

9. California Code of Regulations (CCR), Title 16, section 1812, states:

For purposes of denial, suspension, or revocation of a license or registration pursuant to Division 1.5 (commencing with Section 475) of the Code, a crime or act shall be considered to be substantially related to the qualifications, functions or duties of a person holding a license under Chapters 13, 13.5, 14, and 16 of Division 2 of the Code if to a substantial degree it evidences present or potential unfitness of a person holding a license to perform the functions authorized by his or her license in a manner consistent with the public health, safety or welfare.

COST RECOVERY

10. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

FACTS

11. In 2016, Respondent was employed by Kaiser Permanente as a Psychiatric Social Worker at locations in Corona and Ontario, California. Respondent became involved in a sexual/romantic relationship with one of his patients (Patient L).

12. In late June 2016, Respondent started treating Patient L following Patient L's apparent attempted suicide earlier that month and due to her marital problems. Respondent knew that Patient L was married and about her history of infidelity, anxiety, depression, Bipolar Disorder, PTSD, and suspected Borderline Personality Disorder.

13. Respondent treated Patient L through individual therapy once a week and group therapy once a week. On or about Wednesday, September 28, 2016, immediately following

1 group therapy, Respondent told Patient L to come with him for an individual session. Respondent
2 moved close to Patient L to smell her perfume; he asked her what she liked about him; and he told
3 Patient L that he liked her legs.

4 14. The next day, Thursday, September 29, 2016, Patient L contacted Respondent
5 through the Kaiser website and left her phone number. Using the Kaiser line, Respondent called
6 Patient L and they agreed to communicate without Patient L's husband knowing by using a
7 messaging application. They began to exchange messages in which Respondent said he wanted
8 to hug Patient L in person and they made plans to meet the following day.

9 15. The next day, Friday, September 30, 2016, they met at Respondent's office and, in his
10 private office, they hugged and Respondent kissed Patient L. She straddled Respondent and they
11 kissed some more.

12 16. Going forward, Respondent and Patient L communicated daily by phone and
13 messaging. She continued to see Respondent for therapy. After the group therapy sessions, the
14 two would meet in Respondent's office and they would kiss and hug.

15 17. Patient L told another therapist of her relationship with Respondent. The therapist
16 advised Patient L to report the relationship to the Board of Behavior Sciences (Board). Patient L
17 then texted a picture of a note depicting the Board's phone number to Respondent and said she
18 was going to report him to the Board. Respondent and Patient L then agreed to meet.

19 18. On or about October 16, 2016, Respondent met Patient L in a store parking lot and
20 offered Patient L money or a car in exchange for not reporting him to the Board. Patient L
21 refused a car and Respondent offered her \$15,000.00 to not report him. They got into
22 Respondent's car and began to hug and kiss. Respondent then told Patient L that, if she had
23 feelings for him, she would give him oral sex. Patient L gave Respondent oral sex. Patient L
24 then agreed and accepted the offer of \$15,000.00 not to report Respondent to the Board and they
25 planned to formalize the agreement in writing and have it notarized.

26 19. On or about October 17, 2016, Respondent picked up Patient L at a store and drove
27 her to a coffee shop to meet a notary. Respondent produced an agreement that included a non-
28 disclosure clause. Upon meeting with the notary they signed the document. Next, they went to

1 Respondent's office where he gave Patient L \$15,000.00 in cash and a copy of the agreement.

2 20. Respondent and Patient L continued to communicate and Respondent continued to
3 treat Patient L. Following a session in late October 2016, Respondent and Patient L went in his
4 car to a park. While parked there, they discussed having sex. Patient L's husband arrived in his
5 car and spotted Patient L. Patient L told Respondent to drive away and they did.

6 21. Respondent later called Patient L's husband. Respondent lied and told him that
7 Patient L had been in a car with a lawyer because she was seeking a divorce.

8 22. On or about June 14, 2018, in Los Angeles County Superior Court criminal case no.
9 8ES00181, *The People of the State of California v. Isaac G. Carreon*, Respondent was convicted
10 on his plea of nolo contendere of driving in willful or wanton disregard for the safety of persons
11 or property after having consumed alcohol or a drug ("wet reckless") in exchange for dismissal of
12 a charge of driving under the influence. (Veh. Code, §§ 23103.5 & 23152, subd. (a),
13 respectively.) The Superior Court placed Respondent on probation for three years, imposed a
14 fine, and ordered Respondent to complete a driving under the influence education program. The
15 facts that lead to the conviction are that, soon after midnight on or about October 17, 2017, a
16 California Highway Patrol officer stopped Respondent for speeding in east Los Angeles. The
17 officer smelled alcohol on Respondent, suspected that he was driving under the influence, and
18 arrested him after he performed poorly on field sobriety tests. Respondent refused to provide a
19 biological sample for blood-alcohol concentration analysis.

20 **FIRST CAUSE FOR DISCIPLINE**

21 **(Unprofessional Conduct - Engaging in Sexual Relations with a Patient or 22 Former Patient)**

23 23. Respondent is subject to disciplinary action under Code sections 726, 729, 4982,
24 subdivisions (e) and (k), and 4982.26 for unprofessional conduct, in that he engaged in sexual
25 relations with Patient L, as set forth in detail in paragraphs 11 through 22 above, which are
26 incorporated herein by reference.

27 ///

28 ///

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct - Gross Negligence or Incompetence)**

3 24. Respondent is subject to disciplinary action under Code section 4982, subdivision (d),
4 for unprofessional conduct, in that he committed acts of gross negligence or incompetence in the
5 performance of marriage and family therapy by engaging in sexual relations with Patient L, as set
6 forth in detail in paragraphs 11 through 22 above, which are incorporated herein by reference.

7 **THIRD CAUSE FOR DISCIPLINE**

8 **(Unprofessional Conduct - Engaging in Dishonest, Corrupt, or Fraudulent Acts)**

9 25. Respondent is subject to disciplinary action under Code section 4982, subdivision (j),
10 for unprofessional conduct, in that he engaged in dishonest, corrupt, or fraudulent acts
11 substantially-related to the qualifications, functions, or duties of a license or registrant, as set forth
12 in detail in paragraphs 11 through 22 above, which are incorporated herein by reference.

13 **FOURTH CAUSE FOR DISCIPLINE**

14 **(Unprofessional Conduct – Intentionally or Recklessly Causing Physical or**
15 **Emotional Harm to Any Client)**

16 26. Respondent is subject to disciplinary action under Code section 4982, subdivision (i),
17 for unprofessional conduct, in that he intentionally or recklessly caused physical or emotional
18 harm to Patient L, as set forth in detail in paragraphs 11 through 22 above, which are incorporated
19 herein by reference.

20 **FIFTH CAUSE FOR DISCIPLINE**

21 **(Unprofessional Conduct – Conviction of a Crime Substantially Related to the**
22 **Qualifications, Functions, or Duties of a Licensee)**

23 27. Respondent is subject to disciplinary action under Code section 4982, subdivision (a),
24 for unprofessional conduct, in that he was convicted of a crime substantially related to the
25 qualifications, functions, or duties of a licensee, as set forth in detail in paragraphs 11 through 22
26 above, which are incorporated herein by reference.

27 ///

28 ///

1 **SIXTH CAUSE FOR DISCIPLINE**

2 **(Unprofessional Conduct – Dangerous Self-Administration of Alcohol)**


3 28. Respondent is subject to disciplinary action under Code section 4982, subdivision (c),
4 for unprofessional conduct, in that he used alcoholic beverages to the extent or in a manner as to
5 be dangerous or injurious to the himself or others, as set forth in detail in paragraphs 11 through
6 22 above, which are incorporated herein by reference.

7 **PRAYER**

8 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,
9 and that following the hearing, the Board of Behavioral Sciences issue a decision:

- 10 1. Revoking or suspending Licensed Marriage and Family Therapist License Number
11 LMFT 48464, issued to Respondent Isaac Carreon;
- 12 2. Ordering Respondent Isaac Carreon to pay the Board of Behavioral Sciences the
13 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
14 Professions Code section 125.3; and,
- 15 3. Taking such other and further action as deemed necessary and proper.

16
17 DATED: June 29, 2018


KIM MADSEN, Executive Officer
Board of Behavioral Sciences
Department of Consumer Affairs
State of California
Complainant

18
19
20
21 SD2017802291
71506067.docx